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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL LETTER BRIEF FOR
TELEPHONIC HEARING**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Uber Technologies, Inc. and
7 Ottomotto LLC’s Administrative Motion to File Under Seal Letter Brief for Telephonic Hearing (the
8 “Administrative Motion”). The Administrative Motion seeks an order sealing highlighted portions of
9 Defendants’ Letter Brief for Telephonic Hearing (“Uber’s Letter Brief”) and the entirety of Exhibits
10 1-2 thereto.

11 3. The portions of Uber’s Letter Brief and Exhibits 1-2 identified below contain or refer
12 to confidential business information and/or attorney advice, which Waymo seeks to seal.

13 4. Uber’s Letter Brief (portions highlighted in green), Exhibit 1 (entire document), and
14 Exhibit 2 (portions highlighted in green in version filed herewith) contain, reference, and/or describe
15 highly confidential and sensitive business information. The information Waymo seeks to seal regards
16 confidential policies regarding off-the-record communications. I understand that this confidential
17 business information is maintained by Waymo as secret. The public disclosure of this information
18 would give Waymo’s competitors access to information about Waymo’s business practices. If such
19 information were made public, I understand that Waymo’s competitive standing would be
20 significantly harmed.

21 5. Exhibit 1 (entire document) additionally contains, references, and/or describes
22 Waymo’s confidential attorney advice. The information Waymo seeks to seal regards confidential
23 attorney advice regarding company policy on off-the-record communications. I understand that this
24 confidential information is maintained by Waymo as secret and that it is subject to Waymo’s attorney-
25 client privilege and work product protection, which have not been waived, pursuant to the Court’s
26 Order Pursuant to Rule 502, Fed. R. Ev. (Dkt. 2363). The public disclosure of this information would
27 be contrary to the Court’s Order. If such information were made public, I understand that Waymo’s
28

1 competitive standing would be significantly harmed by exposure of its confidential legal strategy and
2 advice.

3 6. Waymo's request to seal is narrowly tailored to those portions of Uber's Letter Brief
4 and Exhibits 1-2 that merit sealing.

5
6 I declare under penalty of perjury under the laws of the State of California and the United
7 States of America that the foregoing is true and correct, and that this declaration was executed in San
8 Francisco, California, on December 18, 2017.

9 By /s/ Felipe Corredor

10 Felipe Corredor
11 Attorneys for WAYMO LLC
12

13 **ATTESTATION**

14 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
15 document has been obtained from Felipe Corredor.

16
17 By: /s/ Charles K. Verhoeven
18 Charles K. Verhoeven
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